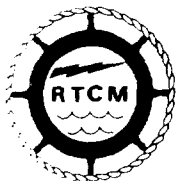


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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Amendment of the Commission's Rules)
Concerning Maritime Communications)

PR Docket No. 92-257

COMMENTS OF THE
RADIO TECHNICAL COMMISSION FOR MARITIME SERVICES

The Radio Technical Commission for Maritime Services (RTCM) respectfully submits the following comments in response to the Notice of Proposed Rule Making (NPRM) portion of the Commission's combined Notice of Proposed Rule Making (NPRM) and Notice of Inquiry (NOI) in the above entitled matter.

The RTCM is a non-profit organization whose objectives include studying and preparing reports on maritime telecommunications practices, needs and technologies with a view toward improving the efficiency and capabilities of maritime telecommunications services, suggesting ways to keep rules and regulations to the minimum essential for effective maritime telecommunications and

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making recommendations on important issues involving maritime telecommunications.

In regard to the NPRM portion of the Commissions Notice, the RTCM notes that PR Docket 92-235, referred to as the "Re-farming Docket", involves a major review of land mobile spectrum requirements. The culmination of actions proposed in that Docket is expected to alleviate the requirements for spectrum by the land mobile interest for the foreseeable future. Until consideration of Docket 92-235 is completed, RTCM is of the view that it is premature to "invade" spectrum now available for maritime communications purposes. The final outcome of Docket 92-235 could be the provision of frequency resources for the land mobile community from within the spectrum currently available to those services. If so, this would preclude the need for becoming involved with spectrum sharing with the maritime mobile services. The RTCM commends the Commission for the undertaking in Docket 92-235 with the hope and expectation that it will not be necessary to share the spectrum of other services to meet land mobile requirements.

The RTCM further notes that maritime services are different from domestic land mobile services in that the former are, to a great degree, international in character. Ship operations become critical as they approach the coastlines of the world and then enter national waters. The ships have voluminous traffic directly related to navigation safety (with direct relationship to environmental

protection in event of a grounding or collision) as well as unloading of cargo, arrangements for repair and resupply and the taking on of new cargo.

While it is obvious that some sharing of maritime spectrum is possible in a country as large as the United States (and is already being done), this sharing cannot be extended to areas of maritime activity. When small craft operations (representing an estimated 1.25 million VHF users) are considered along with commercial shipping, there is, however, a clear limit as to the extent to which sharing can take place without detriment to safety.

Noting the foregoing, RTCM is of the view that sharing of maritime frequencies, particularly on a co-primary basis is wrong in concept. Shipping depends upon telecommunications for immediate communications related to safety/environmental protection and ships cannot wait for a co-primary users to "get off the air". In general, land mobile users do not have the same urgent need for immediate communications.

Taking the views expressed above into account, the RTCM urges the Commission to:

(a) Defer action on the rulemaking portion of the Notice in this proceeding until the action on "re-farming" in Docket 92-235 is completed, and

(b) To reconsider the proposed sharing of maritime spectrum with other services on a co-primary basis, and insure that primary